

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

**FILED**

MAR 23 2017

DAVID CREWS, CLERK  
BY William  
Deputy

UNITED STATES OF AMERICA

V.

CRIMINAL NO. 3:17-cr-033

JACKIE LEE BROOKS, TAMMY JOANNE BROOKS,  
NELVIN MARTINEZ-DUARTE, a/k/a, "Melvin Martinez-Duarte"  
a/k/a, "Nelvin Viloney Martinez-Duarte" a/k/a, "Newbie",  
RACHEL NICOLE JOHNSON, BOBBY FRED WILLIAMSON,  
a/k/a, "Bob", JAMES EDWARD ORRELL, a/k/a, "Fast Eddie"

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Beginning at a time unknown to the Grand Jury, but from on or about December 2015, to  
on or about February 2017, in the Northern District of Mississippi and elsewhere, the defendants:

JACKIE LEE BROOKS  
TAMMY JOANNE BROOKS  
NELVIN MARTINEZ-DUARTE,  
a/k/a, "Melvin Martinez-Duarte"  
a/k/a, "Nelvin Viloney Martinez-Duarte"  
a/k/a, "Newbie"  
RACHEL NICOLE JOHNSON  
BOBBY FRED WILLIAMSON, a/k/a, "Bob"  
JAMES EDWARD ORRELL, a/k/a, "Fast Eddie"

did unlawfully, knowingly and intentionally conspire and agree with each other and with other  
persons both known and unknown to the Grand Jury, to possess with intent to distribute and to  
distribute a mixture and substance containing a detectable amount of methamphetamine, a  
Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a) and  
846.

**Quantity of Methamphetamine Involved in the Conspiracy**

With respect to **JACKIE LEE BROOKS**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers (methamphetamine), in violation of Title 21, United States Code, Section 841(b)(1)(A).

With respect to **TAMMY JOANNE BROOKS**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers (methamphetamine), in violation of Title 21, United States Code, Section 841(b)(1)(A).

With respect to **NELVIN MARTINEZ-DUARTE, a/k/a “Melvin Martinez-Duarte”, a/k/a “Nelvin Viloney Martinez-Duarte”, a/k/a, “Newbie”** the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers (methamphetamine), in violation of Title 21, United States Code, Section 841(b)(1)(A).

With respect to **RACHEL NICOLE JOHNSON**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers (methamphetamine), in violation of Title 21, United States Code, Section 841(b)(1)(A).

With respect to **BOBBY FRED WILLIAMSON, a/k/a, “Bob”**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers (methamphetamine), in violation of Title 21, United States Code, Section 841(b)(1)(A).

With respect to **JAMES EDWARD ORRELL, a/k/a, “Fast Eddie”** the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him is such that the defendant is in violation of possessing with intent to distribute and distributing a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers (methamphetamine), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841 (b)(1)(C).

### **MANNER, MEANS AND OBJECTS OF THE CONSPIRACY**

The following paragraphs identify some of the objects of this criminal conspiracy, which were accomplished by the following means, among others, and in the following manner:

1. As part of the conspiracy, co-conspirators played different roles in the conspiracy, took upon themselves different tasks, and participated in the conduct of the drug trafficking network through various criminal acts. The co-conspirators made themselves and their services available at various times throughout the conspiracy and participated in certain drug trafficking ventures as required to promote and protect the distribution operation.

2. It was further part of the conspiracy that co-conspirators would correspond with each other and with other methamphetamine traffickers in Mississippi, Tennessee, Alabama, Arkansas, Georgia and California, among other places, to arrange for the shipment of large

quantities of methamphetamine into the Northern District of Mississippi, and elsewhere, in order for said methamphetamine to be distributed in the Northern District of Mississippi, and elsewhere.

3. It was further part of the conspiracy that co-conspirators stored and counted drug proceeds, derived from the sale of methamphetamine, in the Northern District of Mississippi and elsewhere.

4. It was further part of the conspiracy that co-conspirators transported United States currency from Mississippi to California in order to purchase significant quantities of methamphetamine in California.

5. It was further part of the conspiracy that once said methamphetamine was purchased in California, it was transported to the Northern District of Mississippi, and elsewhere, in order for the methamphetamine to be distributed in the Northern District of Mississippi and elsewhere.

6. It was further part of the conspiracy that co-conspirators used telephones, including cellular telephones, to facilitate their illegal narcotics business; that is by making telephone calls and text messages to communicate with each other, with suppliers, and customers in furtherance of their illegal drug trafficking conspiracy.

7. It was further part of the conspiracy, that on or about February 2017, co-conspirators accumulated the illegal proceeds derived from the sale and distribution of methamphetamine, that being United States currency, and then traveled with said proceeds to Southern California and purchased approximately 34 pounds of methamphetamine.

8. It was further part of the conspiracy, that on or about February 2017, members of the conspiracy traveled from Southern California to the Northern District of Mississippi in possession of approximately 34 pounds of methamphetamine which was to be distributed in the

Northern District of Mississippi and elsewhere. On or about February 11, 2017, approximately 34 pounds of methamphetamine and approximately \$42,000 in cash were seized from the possession of **JACKIE LEE BROOKS** and **NELVIN MARTINEZ-DUARTE, a/k/a “Melvin Martinez-Duarte”, a/k/a “Nelvin Viloney Martinez-Duarte”, a/k/a “Newbie”**.

All in violation of Title 21, United States Code, Section 846.

### **COUNT TWO**

On or about October 12, 2016, in the Northern District of Mississippi, **JACKIE LEE BROOKS**, defendant, did knowingly and intentionally possess with intent to distribute and distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers (methamphetamine), in violation of Title 21, United States Code, Section 841(a) and (b)(1)(A).

### **COUNT THREE**

On or about November 7, 2016, in the Northern District of Mississippi, **JACKIE LEE BROOKS**, defendant, did knowingly and intentionally possess with intent to distribute and distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers (methamphetamine), in violation of Title 21, United States Code, Section 841(a) and (b)(1)(A).

### **COUNT FOUR**

On or about December 7, 2016, in the Northern District of Mississippi, **JACKIE LEE BROOKS**, defendant, did knowingly and intentionally possess with intent to distribute and distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers (methamphetamine), in violation of Title 21, United States Code, Section 841(a) and (b)(1)(A).

**COUNT FIVE**

On or about February 1, 2017, in the Northern District of Mississippi, **JACKIE LEE BROOKS**, defendant, did knowingly and intentionally possess with intent to distribute and distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers (methamphetamine), in violation of Title 21, United States Code, Section 841(a) and (b)(1)(A).

**COUNT SIX**

On or about February 11, 2017, in the Northern District of Mississippi, **JACKIE LEE BROOKS** and **NELVIN MARTINEZ-DUARTE**, a/k/a “Melvin Martinez-Duarte”, a/k/a “Nelvin Viloney Martinez-Duarte”, a/k/a “Newbie”, defendants, aided and abetted by each other, did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers (methamphetamine), in violation of Title 21, United States Code, Section 841(a) and (b)(1)(A).

**COUNT SEVEN**

On or about February 11, 2017, in the Northern District of Mississippi, **JACKIE LEE BROOKS** and **TAMMY JOANNE BROOKS**, defendants, aided and abetted by each other, did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers (methamphetamine), in violation of Title 21, United States Code, Section 841(a) and (b)(1)(A).

**COUNT EIGHT**

On or about February 11, 2017, in the Northern District of Mississippi, **JACKIE LEE BROOKS**, defendant, having been convicted in a court of a felony offense, that is a crime punishable by imprisonment for a term exceeding one year, knowingly possessed the following firearm in and affecting interstate commerce, namely:

1. Maverick Arms, model 88, 12-gauge shotgun;
2. Browning model Medallion, .270 caliber rifle;
3. Winchester, model 1200, 16-gauge shotgun;
4. Savage, model 94 series M, 12-gauge shotgun;
5. Russian, model Mosin Nagant, 7.62 caliber rifle;
6. High Standard, model Sentinel, .22 caliber revolver;
7. Marlin Firearms, model 60W, .22 caliber rifle;
8. Howa, model 1500, .223 caliber rifle;
9. Taurus, model S411220, single shot 410 caliber shotgun;

in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT NINE**

On or about February 11, 2017, in the Northern District of Mississippi, **NELVIN MARTINEZ-DUARTE**, a/k/a “Melvin Martinez-Duarte”, a/k/a “Nelvin Viloney Martinez-Duarte”, a/k/a “Newbie”, defendant, an illegal alien, having been previously excluded, deported, and removed from the United States, was thereafter found in the United States without the required express consent of the Attorney General of the United States or the Secretary of the U.S. Department of Homeland Security, in that the defendant was found in Marshall County, Mississippi, on or about February 11, 2017, having been lawfully excluded, deported, and removed from the United States on or about November 18, 2004 and again on October 30, 2015; in violation of Title 8, United States Code, Section 1326(a)(2).

**COUNT TEN**

On or about February 7, 2017, in the Northern District of Mississippi, **NELVIN MARTINEZ-DUARTE, a/k/a, “Melvin Martinez-Duarte” a/k/a, “Nelvin Viloney Martinez-Duarte” a/k/a, “Newbie”**, defendant, then being an alien illegally and unlawfully in the United States, knowingly possessed a firearm in and affecting interstate commerce, namely a Maverick Arms, model 88, 12-gauge shotgun, in violation of Title 18, United States Code, Sections 922(g)(5) and 924(a)(2).

**COUNT ELEVEN**

1. The allegations alleged in Count One of the Indictment are hereby re-alleged and incorporated by reference herein:

Beginning at a time unknown to the Grand Jury, but from on or about December 2015, through on or about February 2017, in the Northern District of Mississippi and elsewhere,

**JACKIE LEE BROOKS  
TAMMY JOANNE BROOKS  
NELVIN MARTINEZ-DUARTE,  
a/k/a, “Melvin Martinez-Duarte”  
a/k/a, “Nelvin Viloney Martinez-Duarte”  
a/k/a, “Newbie”**

defendants, did knowingly and intentionally conspire with other persons known and unknown to the Grand Jury to travel and cause others to travel in interstate commerce from the State of Mississippi to the State of California, with intent to distribute the proceeds of an unlawful activity, that is, a business enterprise involving the distribution of methamphetamine, a Schedule II controlled substance, and thereafter did perform acts to distribute the proceeds of said unlawful activity; in violation of Title 18, United States Code, Sections 371 and 1952.

**OVERT ACTS**

During the course of the conspiracy the following overt acts among others were performed by the defendants, in furtherance of and to affect the goals of the conspiracy:

1. On or about February 7, 2017, in the Northern District of Mississippi, **JACKIE LEE BROOKS, NELVIN MARTINEZ DUARTE, a/k/a, “Melvin Martinez-Duarte”, a/k/a “Nelvin Viloney Martinez-Duarte”, a/k/a “Newbie” and TAMMY JOANNE BROOKS**, defendants, gathered the proceeds of their unlawful activity, that being approximately \$118,000 in United States Currency derived from the unlawful sale and distribution of methamphetamine and packaged it for travel from the state of Mississippi to the state of California where it would then be distributed to purchase additional methamphetamine.

2. From on or about February 7, 2017 to on or about February 11, 2017, **JACKIE BROOKS and Nelvin Martinez-Duarte, a/k/a “Melvin Martinez-Duarte”, a/k/a “Nelvin Viloney Martinez-Duarte,” a/k/a “Newbie”,** did travel from the state of Mississippi to the state of California with said illegally and unlawfully obtained proceeds. Once in California, the proceeds were distributed by the defendants for the purchase of approximately 34 pounds of methamphetamine which they then transported in interstate commerce from the state of California back to the state of Mississippi where they planned to sell and distribute the methamphetamine in the Northern District of Mississippi and elsewhere,

All in violation of Title 18, United States Code, Section 371.

**Forfeiture Provision**

This indictment charges the defendants:

**JACKIE LEE BROOKS  
TAMMY JOANNE BROOKS  
NELVIN MARTINEZ-DUARTE,  
a/k/a, “Melvin Martinez-Duarte”**

a/k/a, "Nelvin Viloney Martinez-Duarte"  
a/k/a, "Newbie"  
RACHEL NICOLE JOHNSON  
BOBBY FRED WILLIAMSON, a/k/a, "Bob",  
JAMES EDWARD ORRELL, a/k/a, "Fast Eddie"

with a violation of Title 21, United States Code, Section 841(a)(1). Pursuant to Title 21, United States Code, Section 853, upon conviction of any said violations of the law, defendant(s) shall forfeit to the United States (1) any property obtained, directly or indirectly, as the result of such violation(s), and (2) any of his property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations.

Further, if any of the property described as being subject to forfeiture, as a result of any act or omission of the defendant(s):

(a) cannot be located upon the exercise of due diligence;

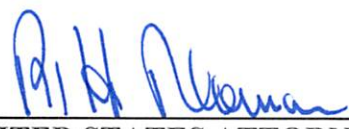
(b) has been transferred or sold to, or deposited with, a third person;

(c) has been placed beyond the jurisdiction of this Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant.

A TRUE BILL

  
UNITED STATES ATTORNEY  
*acting*

/s/redacted signature  
FOREPERSON